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VIA ECF

The Honorable Ann M. Donnelly
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Henkin, et al. v. Qatar Charity, et al., No. 1:21-cv-05716-AMD-VMS

Dear Judge Donnelly:

We write on behalf of Defendant Qatar National Bank (Q.P.S.C.) (“QNB”) in the above-referenced action to respectfully request that the Court stay the deadline for QNB to respond to the Intervenor Complaint (ECF No. 100). Earlier this week, the Court entered an order staying Defendants Masraf Al Rayan and Qatar Charity’s deadline to respond to the Intervenor Complaint until after the conclusion of jurisdictional discovery. In order to have a uniform deadline for all Defendants to respond to the Intervenor Complaint, QNB respectfully requests that the scheduling order governing the timing of Masraf Al Rayan and Qatar Charity’s responses to the Intervenor Complaint likewise govern the timing of QNB’s response to the Intervenor Complaint. During this stay, QNB would continue not to be subject to discovery, consistent with the Court’s dismissal of the original Complaint as to QNB and given Intervenor Plaintiffs’ acknowledgement that their allegations are “identical” to those in the original Complaint (ECF No. 95 at 2).

Intervenor Plaintiffs do not object to Defendant QNB’s request.

Respectfully submitted,

/s/ Michael G. McGovern

Michael G. McGovern

cc: All counsel of record (by ECF)